

INEOS ABS

INEOS ABS (USA) Corporation

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January 23, 2015

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

RE: Consent Decree Civil Action No. 1:09-CV-545
Effective Date February 4, 2010

Dear Sirs:

Please find attached the Quarterly Report for Fourth Quarter 2014. Please contact me at (513) 467-2184 or bradley.fattlar@ineos.com if you have any questions concerning the submitted information.

Respectfully Submitted,



Bradley Fattlar
Air Quality Engineer
INEOS ABS (USA) Corporation

cc: M. Palermo, USEPA Region 5
B. Weinburg, OEPA
G. Bachmann, Ohio AG
B. Pray (M. Kramer), SWOAQA

INEOS ABS (USA) CORPORATION'S ADDYSTON, OH PLANT
CONSENT DECREE QUARTERLY REPORT

Consent Decree Civil Action No. 1:09-CV-545

Effective Date February 4, 2010

Reporting Period: 10/31/14 – 12/31/14

I. INTRODUCTION

The following report contains the required information about INEOS ABS' compliance activities associated with the requirements in Paragraph 50 a. and 50 b. in the Consent Decree.

II. LEAK DETECTION AND REPAIR (LDAR) REPORTING OBLIGATIONS

Per Appendix A of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

A. COMPLIANCE STATUS REPORTS

The First Half 2014 Compliance Status Report was submitted on July 30, 2014.

B. CORRECTIVE ACTION PLANS

The 2015 corrective action plan was submitted on December 18, 2014.

C. CERTIFICATE OF COMPLIANCE

No certificate was required to be submitted during this period.

III. FLARE MONITORING INSTRUMENTS REPORTING OBLIGATIONS

Per Paragraph 23 of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

- Three separate reports were submitted for 3rd Quarter 2014, one for July (August 8, 2014), one for August (September 8, 2014) and one for September (October 2, 2014).

IV. NONCOMPLIANCE WITH CONSENT DECREE

Per Paragraph 50 b. of the Consent Decree, INEOS ABS submitted the following letters of noncompliance to the U.S. EPA and Ohio EPA:

Two letters from the Third Quarter 2014 were accidentally omitted from the Third Quarter Report. They have been specified below.

Letter Dated 8/21/14 - This letter report is to inform you that a combination of 58 valves and open ended lines (OEL's) were not monitored under their quarterly frequency since the project went into service on March 12, 2014. The components were added due to a new acrylonitrile rail car unloading project. These components belong to process unit P001. The components were not monitored for first or second quarter 2014. The components were put into the LDAR program on August 18 and 19, 2014. All of the components were monitored on August 19, 2014. No leaks were identified during the